



The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

April 13, 2021

Tammy Turley
Chief, Regulatory Division
US Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742-2751

RE: Northern Avenue Bridge, Fort Point Channel, Boston, MA; MHC# RC.2913
US Army Corps of Engineers, Regulatory Division, File No. NAE-2015-02009

Dear Ms. Turley:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the draft Memorandum of Agreement (MOA) that was submitted, received at this office on March 15, 2021, for the Northern Avenue Bridge project and have the following comments.

Whereas clause number three should be edited to include not only the U.S. Coast Guard's authorization for the installation of the bridge but also the design of the bridge.

Whereas clause thirteen misstates that the Advisory Council of Historic Preservation (ACHP) will not participate in consultation. The ACHP wrote to the US Army Corps on June 13, 2016 stating they would participate in consultation.

Whereas clause fifteen should be changed to add the National Trust for Historic Preservation as a consulting party, who accepted the US Army Corps invitation to be a consulting party in their letter dated June 30, 2016. The Whereas clause should be revised to list all parties who requested to be consulting parties.

The MHC requests that the recordation stipulation be expanded to include recordation of the Bridge Tender's house. As a critical component of the operation of the Northern Avenue Bridge, the MHC requests that recordation include interior and exterior photographs of the Bridge Tender's house as well as photographs and inventory of all the extant equipment.

The MHC requests that there be a separate stipulation for an Interpretive Plan. An interpretive plan should be developed and submitted to the consulting parties for review and approval. The interpretive plan should detail specific items that includes panels, locations of interpretive panels, and online (web) interpretative content. All interpretive information should include the Northern Avenue Bridge, the Bridge Tender's House, and their content within the City of Boston and the Fort Point Channel. The stipulations regarding interpretive items should designate a party for upkeep and maintenance for all physical and digital interpretive items.

The MHC request changes to the Reuse and Retention of Historic Materials stipulation. Vertical members should be specifically identified. Additionally, the MHC request that the historic bridge pieces that have been identified for removal, retention and reuse be identified on existing structure plans to the consulting parties. Additionally, the proposed bridge plans should indicate where the salvaged historic structural elements will be installed. The MHC recommends that the stipulation be expanded to require the services of a qualified historic structures conservator to oversee the physical removal and reinstallation to ensure these salvaged elements are treated physically and chemically in a manner that will not harm the historic materials.

The MHC requests an additional stipulation be added to the MOA for Design Review of the proposed new bridge. The City of Boston should be required to submit to the consulting parties documents setting forth the design of the new bridge which


represent approximately thirty percent (30%) of the engineering progress and also which represent approximately ninety percent (90%) of the design. The consulting parties review should not be limited to the placement of historic materials but shall take into consideration the overall design of the new bridge within the context of the Fort Point Channel. Review timelines should be included within this new stipulation. Language should be added for federal agency enforcement of this section (by the Corps and/or USCG).

Finally, the MHC requests that the Signatories be updated to reflect all consulting parties that are also listed in the Whereas clause.

The MHC looks forward to a reviewing a revised draft MOA in response to comments from the MHC, Advisory Council for Historic Preservation, the National Trust for Historic Preservation, and Boston Preservation Alliance.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800) and M.G.L. Chapter 9, sections 26-27C (950 CMR 71.00). Please do not hesitate to contact Elizabeth Sherva of my staff if you have any questions.

Sincerely,



Brona Simon
State Historic Preservation Officer
Executive Director
Massachusetts Historical Commission

xc: Jeff McEwen, FHWA
John McVann, FHWA
Captain B.L. Black, USCG
Jeff Steib, USCG
Ruthann Brien, Army Corps of Engineers New England Division
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Melissa Ryan, AECOM
Rosanne Foley, Boston Landmarks Commission
Greg Galer, Boston Preservation Alliance
Michael Creasey, National Park Service
Elizabeth Merritt, National Trust for Historic Preservation
Michael Tyrrell, Friends of the Northern Avenue Bridge
Paul Farrell, Friends of the Northern Avenue Bridge
Stacey Beuttell, Walk Boston
Jack Glassman, BSA Historic Resources Committee
Carol Chirico, GSA
Judge Douglas Woodcock, Moakely Courthouse
Rachel Borgattis, Friends of Fort Point Channel
Lauren Grymek, Seaport TMA
Todd Lee, Light Boston
Sara McCammond, Fort Point Channel Neighborhood Association
Stacey Thompson, Livable Streets
Becca Wolfson, Boston Cyclists Union
Deanna Moran, Conservation Law Foundation